

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JANE DOE (T.S.),

Plaintiff,

v.

SALESFORCE, INC.;
BACKPAGE.COM, LLC; and
CARL FERRER,

Defendants.

§
§
§
§
§
§
§
§
§
§

CASE NO. 4:23-cv-01729

DEFENDANT CARL FERRER'S ANSWER

TO THE HONORABLE ANDREW S. HANEN,
UNITED STATES DISTRICT JUDGE:

Defendant Carl Ferrer ("Defendant" or "Ferrer") files this Answer in response to Plaintiff Jane Doe (T.S.)'s ("Plaintiff") Original Petition and, in support thereof, respectfully shows the Court the following:

1. Ferrer invokes his Fifth Amendment privilege against self-incrimination as to each and every, all and singular, of the allegations, claims, and causes of action contained in Plaintiff's Original Petition, and any amendments or supplements thereto, thereby denying same pursuant to Pursuant to Fed. R. Civ. P. 8(b)(3), and demands strict proof thereof by a preponderance of the evidence.

WHEREFORE, PREMISES CONSIDERED, Ferrer prays that the Court grant him all relief it deems just and appropriate under the circumstances; and for all such other and further relief, whether in law or in equity, to which Ferrer may show himself justly entitled.

Dated: June 28, 2023.

Respectfully submitted,

By: /s/ Mark A. Castillo

Mark A. Castillo (markcastillo@ccsb.com)

State Bar No. 24027795

Southern District Bar No. 31520

Robert C. Rowe (rrowe@ccsb.com)

State Bar No. 24086253

Southern District Bar No. 3782278

CARRINGTON, COLEMAN,

SLOMAN & BLUMENTHAL, L.L.P.

901 Main Street, Suite 5500

Dallas, Texas 75202

(214) 855-3000 – Telephone

(214) 580-2641 – Facsimile

**ATTORNEYS FOR DEFENDANT CARL
FERRER**

CERTIFICATE OF SERVICE

The undersigned certifies that on June 28, 2023, a true and correct copy of the above and foregoing document was electronically served through CM/ECF on all counsel of record, pursuant to the Federal Rules of Civil Procedure

/s/ Mark A. Castillo